

Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood  
Essex  
CM 15 8AY  
26<sup>th</sup> September 2013

Dear Sirs

Brentwood Local Plan 2015-203

**Preferred Options for Consultation**

**Bolsons Limited (“Bolsons”)– Unit 64 Horndon Industrial Park, Station Road, West Horndon, Essex  
CM13 3XL**

Bolsons Limited started business in the 1890's and has been pre eminent in the production of marking, embossing and perforating seals and machinery. We have produced goods for St. James's Palace, The House of Lords, Government Ministeries & Departments of State, HM Embassies & Consulates, Notaries Public, The NHS , International Companies, Industry, Lawyers and the general public.

Until July 2009 Bolsons had occupied for over 25 years a freehold factory with residential accommodation in Cooks Road, Bow within 100 yards of the Olympic Stadium. As a result of award of the Olympic Games to London our valuable premises were subjected to planning blight caused by inclusion in the original plan for the Olympic Media Centre to be constructed on our land. This plan was dropped. However in May 2009 Crossrail announced that they were compulsorily purchase within 7 weeks the whole of our property which housed heavy machinery and adjoining properties. It was only the efforts of our employees and advisers together with the intervention of my local Member of the London Government (a former Member of Parliament) that prevented the closure and liquidation of Bolsons. Sadly some other businesses in the area (believed to be in excess of 100 firms) were less fortunate. Within the 8 weeks allotted by Crossrail we found a brand new purpose built factory described as Freehold property. Subsequently we were advised that a 999 year lease (not a Freehold) of Unit 64 was to be granted as this enabled the occupiers to enforce covenants and ensure proper management of the Estate.

Despite the intervening 3 years we together with others have yet to receive proper compensation for the draconian manner with which Crossrail dealt with us. The matter is not assisted by Parliament in its wisdom decreeing that interest on outstanding monies is payable at one half a per cent of the Bank of England Base rate from time to time. Bearing in mind that the current rate is 0.5 percent which equals Nought per cent it might explain the lack of urgency on Crossrail's behalf. Crossrail having agreed in writing to pay the initial tranche of compensation on vacating Cooks Road reneged on this agreement and only on being notified that Bolsons would apply to the High Court of Justice to wind up Crossrail did they not release the funds to enable Bolsons to complete the purchase of Unit 64. The continued failure of Crossrail to release any further funds including the balance of our removal costs has inhibited the development of this versatile engineering company which brings valuable employment to its skilled staff.

It will thus be seen that the Proposed Plan coming so soon after an unnecessarily traumatic compulsory purchase is obviously not good news and will mean more ongoing uncertainty, which is desperately unfair after all Bolsons has had to endure in the last few years.

Bolsons is an innovative organisation and has been able to adapt to change however the Consultation documents on an initial reading raises a number of justifiable concerns which will need to be addressed if the Council implement them as presently detailed.

However:

it is not finalised policy and it will cause uncertainty in planning the future development of the company and particular the future of Bolsons' current and potential employees; the proposal expressly contemplates a mixed use development – meaning housing and employment (and other uses); is it intended therefore to retain the newly constructed Units on the Estate of which Unit 64 is one. Please detail the consideration and reasons of the Council for demolishing such recently constructed premises for which they recently gave consent to their construction

It is noted that the Council is adopting a planning policy that is “only” the platform upon which development may proceed. The reality is that the property will have to be purchased and as many a scheme never sees the light of day because of failed negotiations etc. This will be cold comfort in view of Crossrail's conduct at Cooks Road.

The Council is plainly relying on the West Horndon Strategic Allocation (of which the industrial estate forms a part) to meet a sizeable chunk (1500) of the dwellings that it needs to provide over the next 15 years or so: see Policies S1 and S2. It will therefore want to see this proposed policy adopted; it is its “preferred option” after it is stated careful consideration of the alternatives. What were these alternatives ?

At this moment of time the proposals leave us with no alternative but to make it clear that the existing estate should remain, and we emphasise the fact that the Horndon Industrial Park Estate (and Bolsons in particular) provides much needed employment and economic activity; both things we would reasonably expect any emerging Plan and national planning policy also seek to promote.

We also believe that there is quite a lot in the preferred options document that provides ammunition to argue for retention of employment land to seek to retain existing business uses within any new vision for the area.

We accordingly reserve our position to submit a more detailed submission in particular with regard to the Preferred Options document:

Policy S03 addresses economic and employment growth and policy S3 addresses job growth and employment land (including proposing 31 hectares of new employment allocations). Interestingly, para 2.44 records that there are high levels of satisfaction with existing employment premises and that there is “tightness” of identified future supply, relative to demand, hence the need for new allocations. The current proposals do not appear to apply to Bolsons.

If this sort of scale of new land is needed, it seems odd to promote policies that might result in the loss of a good purpose-built site, where there are presumably reasonably high levels of satisfaction with existing premises. Surely it is more sustainable to maintain a good existing estate than to flatten it and start over somewhere new ? National planning policy similarly promotes economic growth and employment (as well as housing etc) and seeks to support existing business sectors and to minimise journey lengths for employment etc. Currently Bolsons Unit 64 has easy access to public transport in particular West Horndon Station. What suggested alternatives does the Council have in mind when they formulated these proposals?

Policy CP3 provides that West Horndon is to be a “mixed use” development site, including housing, employment, community, education, health etc. Surely Bolsons’ activities need to be promoted not jeopardised by yet more uncertainty.

Policy CP4 defines the West Horndon Opportunity Area and states that the Council will work with the community to identify and realise opportunities for regeneration and improvement through the redevelopment of employment land and a strategic allocation to provide mixed use development for housing, employment, community, education, health etc. The text provides that the Council will seek a community masterplanning exercise to agree the form mix and siting of a development “which best reflects local aspirations and the wider Borough spatial strategy”. The current proposals do not appear to apply to Bolsons.

In this context it is interesting to note that, in considering alternatives, the Council rejected an alternative option (see p33) to redevelop for housing etc (but not employment) because that would have required the Council to identify land and premises elsewhere to offset the loss of business and jobs that would occur and would exclude the established business community, and that it was recognised that there would be no guarantee that established business would relocate within the Borough. (Para 3.8 envisages a mix of uses including neighbourly (i.e. compatible) employment uses. What provisions have been made to provide continued employment of Bolsons’ employees ?

Policy CP11 seeks a strong and competitive economy, to maintain high and stable levels of economic growth, enabling the Borough economy to diversify and modernise through the growth of existing business. The current proposals do not appear to apply to Bolsons.

Para 3.38 recognises that Brentwood is an attractive location for business and has a thriving entrepreneurial culture and a skilled workforce. The current proposals do not appear to apply to Bolsons.

Para 3.42 states that more than half of total employment in the Borough is provided by small businesses of up to 49 employees and development that supports that sector will be encouraged. West Horndon is described as a “focus location” to attract economic growth. The current proposals do not appear to apply to Bolsons.

Para 3.44 states that sustainable patterns of growth should be encouraged by utilising existing employment space where possible. The current proposals do not appear to apply to Bolsons.

Policy DM6 provides that the Council seeks to achieve and retain a wide range of employment opportunities (including the proposed new allocation at West Horndon). Para 4.17 states that in areas allocated for general employment and office development on the (draft) Policies Map, the presumption is that existing uses will be retained and proposals entailing loss of employment premises and sites without replacement will be resisted. (The estate is currently allocated as Employment (General) land in the extant 2005 Local Plan: see the Proposals Map.) The current proposals do not appear to apply to Bolsons.

Para 4.98 (p132) describes the 1500 dwelling strategic allocation as comprising 2 existing industrial estates and adjoining greenfield greenbelt land to the north. At Appendix 2 (p195) the preferred housing allocations are listed, including 3 sites (with different owners) in West Horndon for 250, 250 & 1000 dwellings. It is recorded that the source for the inclusion of the sites in the Council’s “Strategic Housing Land Availability Assessment” was “discussion with developer/landowner”. In the case of the estate, there is reference to pre-application discussions having happened in 2012/13. Bolsons is on the area of land numbered 21 (the second 250 dwelling site) owned by Hansteen Land Holdings and the pre-application discussion reference is 12/06173/PREAPP. Please supply the information on the planning file in relation to those discussions, to gain as much information as possible.

In addition to the Preferred Options document, we note the Council has produced the “West Horndon Opportunity Area Supporting Document” dated August 2013. This refers to draft Policy CP4 (West

Horndon Opportunity Area – see above) and sets out that the Council will work in partnership with the local community to identify and realise opportunities for regeneration and improvement and seeks to paint a positive picture about the provision of a mixed-use development, including housing, employment, supporting retail, community facilities (education, health etc), and green spaces. Please detail those considerations in so far as they apply to Unit 64 and other similar adjoining sites.

The document also explains that the location of these uses will be worked through with the local community, as part of a future masterplanning exercise and that the details of numbers, types and locations have yet to be proposed until this masterplan is produced. Finally, all figures are described as draft and it is said that further assessment will be taken into account as to whether proposed development is viable. This supports our fear of the uncertainty the current proposals have. Could details as to how and when this uncertainty will be dealt with.

Please acknowledge receipt of this letter to me at my office:

